EXHIBIT A

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

IAN J. BROWN, JAMES BROWN and BARBARA BROWN Plaintiffs)	
v.)))	CIVIL ACTION NO. 04-11924-RGS
UNITED STATES OF AMERICA,)	
VERIZON NEW ENGLAND INC. and)	
BOSTON EDISON COMPANY d/b/a)	
NSTAR ELECTRIC)	
Defendants)	
)	

AFFIDAVIT OF JOSHUA A. LEWIN, ESQ. IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT BY VERIZON NEW ENGLAND INC.

- I, Joshua A. Lewin, on oath do hereby depose and state as follows:
- 1. I am counsel of record for the defendant, Verizon New England Inc.
- 2. Attached to the <u>Concise Statement of Undisputed Material Facts in Support of Motion For Summary Judgment by Verizon New England Inc.</u> are true and accurate copies of the following documents:
 - a. Documents received from the Clerk of the Town of Bedford pursuant to a public records request <u>Exhibit F</u>;
 - b. Joint Pole Agreement (as produced bates-labeled by the Boston Edison Company,
 d/b/a NStar) Exhibit L;

c. An article entitled "Design Considerations for Existing Utility Poles in Urban Areas" which was contained in the file of Plaintiff's expert, Murray Burnstine, and referenced in his report – Exhibit U.

Joshua A. LEwin